

Response to Comments – Network Integration (NT) Transmission Service

BPA Transmission Business Practice

Version 15
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Version 15

This document contains comments and BPA’s response regarding the Network Integration (NT) Transmission Service, Version 15 posted for comment from March 18, 2024, to April 1, 2024.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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A. NIPPC

NIPPC Comments on draft proposed Network Integration (NT) Transmission Service Version 15.

NIPPC has concerns with the language of the proposed draft business practice governing Network Integration (NT) Service.

NIPPC recognizes that the majority of BPA’s NT customers are BPA preference customers. NIPPC also recognizes that most of BPA’s preference customers rely solely on BPA and the FCRPS to provide the generation needed to serve their loads. Nevertheless, not all of BPA’s NT customers rely solely on Federal resources to serve their loads and the draft business practice should reflect this.

NIPPC has two primary concerns with the language of the business practice. First, the language creates an inappropriate distinction between federal and non-federal resources that the customer has identified as Designated Network Resources to serve its loads. Second, the business practice fails to address or incorporate the key feature of NT Service – the transmission provider’s obligation to plan the transmission grid to meet the forecasted needs of its NT Service customers.

BPA Response

Thank you for these comments. For clarification, the Category A changes to this business practice were intended to be a non-substantive revision to clarify and modernize the business practice.¹ These comments were in response to a follow-up Category A correction to restore

¹ See TC-20-E-BPA-01: “Category A – Clarifications of existing business practice language, grammatical errors, and/or revisions with minor significance.”

the business practice language to what had previously been established through the more exhaustive Category B business practice process.²

Bonneville is committed to and guided by principles of open access and non-discriminatory treatment of customers. Any distinctions between federal and non-federal resources in Bonneville's planning processes, reflected in its business practices, have been developed in order to obtain information necessary for Bonneville to plan for transmission customer needs while meeting its statutory obligations, including to make all capacity in excess of capacity required to transmit federal power available on a fair and non-discriminatory basis.

Bonneville has undertaken an effort to again adjust processes to manage forecasts given their evolving nature. This effort involves solicitation of input from all interested stakeholders, so comments such as these are imperative in that process. The current NT workshop series is intended to specifically address these challenges. BPA will consider these comments in that process and encourages NIPPC to continue to participate in that process.

Thank you again for your comments on this Category A business practice correction, and more importantly, on the challenges that BPA and its customers need to address regarding planning for NT service needs under an OATT construct.

The business practice lays out – in detail – the mechanisms that NT Service customers and BPA (as the transmission provider) must follow in order to ensure that BPA has adequate time to plan its transmission system to serve its NT Service customers with the generation they identify as Designated Network Resources. In short, BPA and its NT customers coordinate on ten-year load and resource forecasts. BPA then encumbers transmission capacity based on those forecasts to ensure that capacity is available to meet the needs of the NT Service customer and that the transmission capacity is not committed to a different use.

The key determination of the appropriate queue time should not be whether a new Designated Network Resource is a non-federal resource (as provided in Section C.2. of the business practice). Rather the determination of the appropriate queue time should be whether BPA has already encumbered transmission capacity based on the load and resource forecast that the customer provided. If an NT Service customer needs to increase its resource forecast (by either adding new DNRs or increasing deliveries from existing DNRs) in order to serve a new load that was not part of its load forecast, then BPA will not have encumbered transmission capacity based on past forecasts. The queue time for such an expanded resource forecast – whether from federal or non-federal resources – should be the date that BPA receives the forecast. Section C.2., however, is silent on the queue time for evaluating an updated load forecast that relies on federal resources. Section C.2. as proposed applies only to updated non-federal resources; that section should apply equally to federal and non-federal resources. In other words, an NT Service customer who identifies a federal resource to serve its unforecasted load should not move to the front of the transmission service queue when the same customer designating a non-federal resource to serve its unforecasted load would have to come into the queue at the end. A business practice that would require NT customers choosing non-federal resources to wait for the transmission service queue process, while allowing NT customers who choose federal resources to avoid the queue process entirely would create a significant incentive for NT customers to choose federal

² *Id.* "Category B - Material revisions to existing business practices and new business practices."

resources over non-federal resources to serve that unanticipated load. Such a result would be entirely inconsistent with FERC’s open access and non-discrimination principles that are expressly intended to mitigate the ability of transmission providers to steer customers towards their affiliated merchant function for their power needs.

Again NIPPC recognizes that these concerns are largely irrelevant for the vast majority of BPA’s NT customers that rely solely on federal resources to meet their needs. At the same time, however, some BPA NT customers are adding new loads -- on short time frames -- that have not been incorporated into their load and resource forecasts with sufficient time for BPA to encumber transmission capacity or plan its system. Federal resources should not have any advantage over non-federal resources in the queue time to serve those unforecasted loads. Unfortunately, as drafted the proposed business practice appears to give federal resources precisely that advantage. Accordingly, NIPPC urges BPA staff to revise the business practice to eliminate distinctions between federal and non-federal resources.

BPA Response

Thank you. Again, Bonneville’s historical practice of netting forecasts against what has been held out to meet its statutory and tariff load planning obligations have led to the processes described in the business practice. As the comments mention, there is a common intersect between federal power and NT service. That said, NT customers are forecasting new loads that are challenging BPA’s existing planning model due to their location and magnitude. The current NT workshop series is intended to specifically address these challenges.

NIPPC recommends the following edits:

Section B. Load & Resource forecast:

Delete the word “non-federal” in subsections 5, 6, 7.a, 9 and 12.a

Section C. Updates Between Annual Load & Resource Forecasts

Delete the word “non-federal” in subsection 2.

Section D. Reserving Transmission Capacity for Forecasted Non-federal Network Resources

Add a parallel section to the business practice addressing how NT customers reserve transmission capacity for forecasted federal Network Resources.

Section F. Additional Requirements for Designating Network Resources

Delete the word “non-federal” from subsection 1.

Thank you for the opportunity to provide these comments.

BPA Response

At this time, BPA is actively engaged in the effort referenced above to consider management of all NT forecasts, which will foreseeably result in significant changes to the business practice. The Category A change addressed in these comments was to restore the business practice language after an inadvertent change removing “non-federal” from a single section of

the business practice. The relevant language has already been subject to the Category B process that provided for customer comment and BPA consideration. Broader changes would require an additional Category B process, which is already contemplated but subject to working through the NT workshop series that is underway. These comments, however, provide important information for BPA to consider, and NIPPC is encouraged to also submit comments in the NT workshop series.